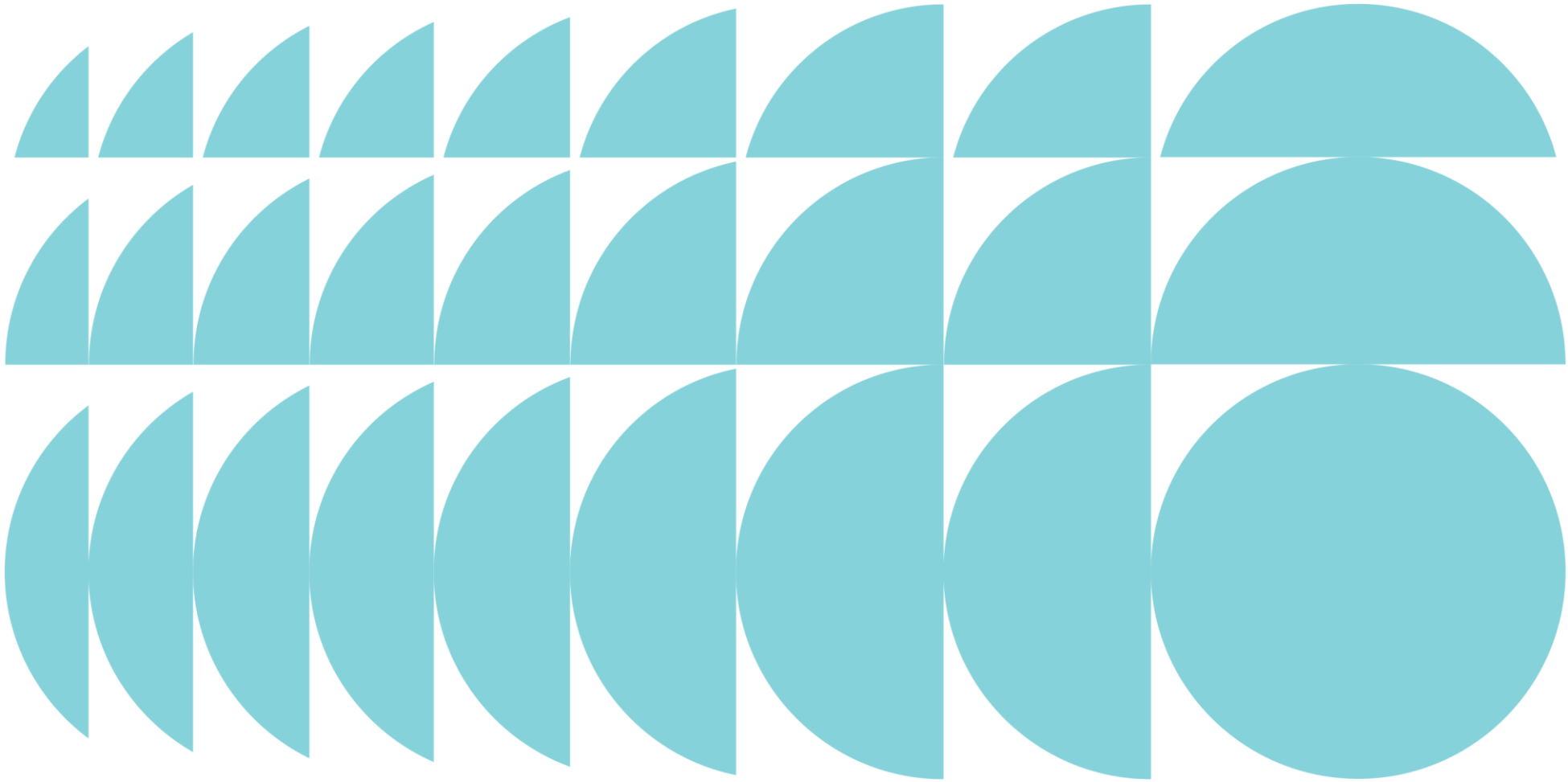
ETHOS URBAN

Addendum Response to Agency Submissions (SSD7275) 80-88 Regent Street, Redfern

Iglu Student Accommodation

3 April 2019 | 218001



Addendum Response to Agency Submissions (SSD 7275), 80-88 Regent St, Redfern

The following table includes a response to the full text of submissions provided by or on behalf of State and local government agencies. For completeness, the full text of each submission is provided in the left-hand column, accompanied by the proponent's corresponding response in the right-hand column. The proponent's responses have been informed by input by the expert consultant team and should be read in conjunction with the attachments as well as the exhibited Environmental Impact Statement and the Response to Submissions documentation submitted on the 24 January 2019.

Item Raised		Proponent's Response
Department of Planning and Environment		
DPE 1a	**BASIX** • The Department is concerned with the proposed BASIX pathway given the risks and uncertainty it poses to the project. The proposed BASIX pathway (i.e. BASIX Certificate now and BASIX alternate assessment post determination) is also inconsistent with best practice and statutorily questionable. • A BASIX alternate assessment can only be undertaken prior to the lodgement, assessment and determination of a development application. It cannot be done post determination (i.e. via a condition of consent). • Whilst the only way your proposed BASIX pathway may be successful is if you lodge a section 4.55 application with a BASIX alternate assessment after the determination of your SSD application. Such an approach carries risk as it is founded on an assumption that the consent authority will accept the Applicant's BASIX Alternate Assessment and any associated design changes to the building would also be required. • The uncertainty of the Applicant's BASIX approach and its significant cost and time implications should therefore not be underestimated, and so it is the Department's view that this should not be the preferred BASIX pathway.	Noted. BASIX Certificates have been submitted to the Department on 13 March 2019. They are currently being amended in relation to DPE 11b and will be provided following lodgement of this RtS addendum.
DPE 2a	**Design Excellence** • Please provide a response to GANSW follow up submission.	Refer to response under the GANSW heading below.
DPE 3a	**Redfern Centre Urban Design Principles** • The currently proposed setback to Marian street is to be further revised to provide a consistent 3m wide setback, in accordance with the previously approved development and the RCUDP.	The Redfern Centre Draft Urban Design Principles requires the following: *To Marian Streets - 1.5m for footpath widening to* ***an average width of 3m*** (**our emphasis added**) The Ground Floor Setbacks plan at **Attachment B** clearly and unambiguously demonstrates that the proposed development is compliant with this control by achieving an average width of 3 metres. The design has evolved to meet previous setback requests such as the provision of a William Lane setback, however, it is maintained that the proposal presents an appropriate and compliant setback to Marian Street and a greater setback would be unwarranted and inconsistent with the applicable planning controls for the site. An increased setback would have unnecessary implications for the structural planning and configuration of the tower above podium level and is not supported by the proponent.

Item Raised		Proponent's Response
DPE 5a	**Wind** • Additional information is required responding to the issues raised by the City of Sydney.	Windtech has reviewed the wind impact related comments and provided a response within **Attachment D**. Windtech's responses have been incorporated (with additions) into this table for completeness. In addition to Windtech's technical responses, we wish to reiterate that the Iglu facility will operate as an integrated campus with the approved Iglu facility to the north which includes a diverse range of indoor and outdoor communal open spaces. The integration of the two facilities will ensure students have access to a range of high quality indoor, rooftop and outdoor communal open space and can occupy these various spaces depending on the prevailing weather conditions at the time. As such, the Level 1 courtyard is not the only space available, it forms part of a diverse and high-quality communal space network. It is not reasonable or possible to ensure that every communal open space is 'weather proofed' against all possible weather conditions.
DPE 5b	• Further investigation is required into design features to mitigate wind impacts, including wind model testing to confirm their effectiveness.	1. The treatment recommendations presented in the Pedestrian Wind Environment Report (WC853-04F02(rev1)- WE Report) are in principle and based on Windtech's experience with previous projects. We expect that with the inclusion of the suggested in-principle treatments the adverse wind conditions can be mitigated to an acceptable level. 2. Windtech have been operating for just under 30 years providing advanced wind engineering services, primarily in the study of wind effects on large structures, façade cladding as well as environmental wind effects. Since its establishment, Windtech has provided wind engineering and related high technology services for over 2,500 major building projects including Iglu Redfern 1, and the Urba and Diecota buildings within the street block. Windtech's extensive experience in this field enables the development of reliable wind mitigation strategies based on the original wind tunnel testing. 3. In this regard, the requirement to undertake very timely and costly additional wind tunnel testing is considered onerous and unnecessary at this stage of the assessment process.
DPE 5c	• Provide a quantifiable comparison between the wind impacts of the proposed design and a design compliant with the required height and setbacks. Include justification and/or wind mitigation measures to address any impacts beyond a compliant development.	The wind impacts of the proposed design have been tested and compared against the existing wind conditions by wind tunnel testing both scenarios, as outlined in the Pedestrian Wind Environment Report (WC853-04F02(rev1)- WE Report). This is in addition to comparing against the wind comfort and safety criteria. This ensures that the development minimises any adverse wind impacts it may cause. Please refer to point 1 and point 2 within the DPE 5b response above.
DPE 6a	**Solar and overshadowing** • The shadow diagrams do not demonstrate the full impact of the development. The adjoining properties to the south-east that are impacted by the proposal must be shown in the diagram (this is relevant for the 3pm shadow diagram).	Bates Smart have broadened the context to which the shadow diagrams relate to show all affected properties. Refer to the updated shadow diagrams illustrated at **Attachment B**.
DPE 6b	• Provide hourly shadow diagrams for the mid-winter solstice. The submitted design report only has for 9am, 12pm and 3pm.	Bates Smart have updated the shadow diagrams to include hourly intervals as illustrated at **Attachment B.**
DPE 6c	• Include a red line on the shadow diagrams demonstrating the shadowing from a compliant building envelope (height and setbacks) and provide justification for any impacts beyond this.	Bates Smart have updated the shadow diagrams to include a 'compliant' building line for shadow impacts as illustrated at **Attachment B.** Pursuant to the Department's correspondence issued on 1 April 2019, the compliant envelope has been built to the northern and western boundaries and would present a blank, inactive façade.

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		As demonstrated on the shadow diagrams, the shadow cast by the proposed development is generally consistent with the shadow cast by a compliant envelope and in some cases, presents a reduced shadow. As the proposal incorporates BCA compliant floor to floor heights to a maximum extent of 18 storeys for a student accommodation use, it can achieve a smaller 18 storey built form than an 18 storey residential development incorporating Apartment Design Guide compliant floor to floor heights. The proposed development does not contribute any significant overshadowing to public places or public open space when compared to a compliant building envelope. As maintained throughout the assessment, the proposal presents a net reduction in overshadowing when compared to the residential development approved under SSD 7080. As such, the Department and the (then) Planning Assessment Commission (PAC) as the consent authority have accepted and approved a development, for which a valid development consent is still held, that creates a greater shadow impact than the proposed development. In light of the above, and considering the site's highly urbanised context, the proposal is considered appropriate from an overshadowing perspective.
DPE 6d	• Quantify the amount of solar access received to the podium level communal open space area.	Bates Smart have assessed and quantified the amount of solar access provided to the Level 1 communal open space as presented at **Attachment B.** Throughout the assessment, the amenity of the Level 1 communal open space has been subject to much scrutiny. In response to this: • The Iglu facility will operate as an integrated campus with the approved Iglu facility to the north which includes a diverse range of indoor and outdoor communal open space at Level 1. These spaces include north and east-facing spaces which receive direct sunlight at a range of times throughout the day and through the year. In order to operate as an integrated facility, the extension of the existing courtyard on the southern boundary of the Iglu#1 building is a logical approach which increases the amenity of an existing space whilst deriving benefits for the new space through the co-location. • The communal indoor and outdoor spaces on Level 1 are complemented by the proposed roof terrace on which will receive high levels of direct sunlight throughout the day and year. This space will be accessible to all students, allowing for students to select from a wide range of communal spaces based upon weather conditions and their desired preferences. • Iglu has a reputation of delivering high quality, architecturally designed buildings and is committed to continuing this into future developments. As Iglu retain ownership of their buildings, there is a direct incentive to maximise the buildings amenity to maintain high occupancy. In this regard, all existing and proposed indoor and outdoor communal spaces will be delivered and maintained to a high quality standard to ensure these spaces are genuinely usable and enhance the amenity of residents.
DPE 7a	**Views** • The Visual Impact Assessment is to be further amended to include both south facing units of the Deicota building	Ethos Urban has updated the Visual Impact Assessment to include both south facing units of the Deicota building as provided at **Attachment E.**
DPE 7b	• Provide a plan similar to the one below, to distinguish each unit type. Please include the room types for the affected units and the proposed setbacks to William Lane, Regent Street and Marian Street.	Refer to the Supplementary Design Report at **Attachment B.**

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DPE 8a	**Landscaping** • A detailed landscaped plan is required. The plan is to be consistent with the measures contained within the Wind report and include a schedule of planting with appropriate plantar depths.	Refer to the Landscape Cover Letter and Amended Landscape Plans at **Attachment F.** There has been a change of tree species within the Level 1 courtyard. The courtyard landscape plan now includes Cupaniopsis anacrdioides (Tuckeroo) to provide a dense evergreen, interlocking canopy to mitigate against wind. It should also be noted the Level 1 podium landscape design also incorporates a planter along the North Western Face of the courtyard of Bambusa Textillis Gracillis which grows to 6m in height which will provide supplementary wind mitigation to the satisfaction of Windtech's recommendations.
DPE 9a	**Noise** • The Department notes the proposed "ventilation box" is now being replaced with the Breezeway Dualair Acoustic Louvre Window System. Please outline the predicted noise levels having reference to the standards in the CoS DCP with regards to residential use for open windows and doors: (i) 45dB for bedrooms (10pm-7am); and (ii) 55dB for main living areas (24 hours).	Refer to the Acoustic Impact Statement prepared by Acoustic Logic at **Attachment G.**
DPE 10a	**Gross Floor Area** • The GFA calculation is to be further revised. The following is to be included as GFA or further justification is required to support the potential exclusion of any of the following - Waste bin rooms at ground level (i.e. these are not located in the basement and therefore are to be included in GFA) - Bike storage - Storage - Level 1 terrace area - Rooftop terrace area • Any changes to the GFA are to be included in an amended FSR calculation and SEPP 1 objection	Bates Smart have updated the GFA Diagrams and as a result, the proposed GFA has increased to 7,374m^2 however this is all contained within the same building envelope. An amended SEPP 1 Objection is provided at **Attachment I.**

Item Raised		Proponent's Response
DPE 11a	**Site Amalgamation** • Provide clarification regarding site amalgamation, is it proposed as part of this application? If so, a lot amalgamation plan is required and updated gross floor area and floor space ratio calculations and an amended SEPP 1 objection is required.	We expect that the Department would impose a condition of development consent requiring that the sites be amalgamated prior to the issue of an Occupation Certificate. To this effect, a Site Amalgamation Plan has been prepared by Veris Surveying (**Attachment J**) which indicates how this would occur. No change is required to the SEPP 1 Objection to the Floor Space Ratio Development Standard as a result of this change – notwithstanding the future amalgamation, this Development Application does not propose that development be carried out on the existing Iglu #1 lot, but rather only on those lots identified in Section 3.2 of the Environmental Impact Statement.
DPE 11b	• Provide consideration as to how site amalgamation would impact BASIX.	The proposed development is a new development and pursuant to the judgement of *SHMH Properties Australia Pty Ltd v City of Sydney Council [2018] NSWLEC 66* a BASIX certificate has been prepared and is currently being updated by IGS to reflect an amalgamated site. The amended BASIX Certificate will be provided following submission of this RtS Addendum. The adjoining Iglu building to the north was assessed prior to the abovementioned judgement and constructed in accordance with the statutory requirements to comply with Section J of the National Construction Code.
DPE 12a	**Additional Plan Detail** • A roof plan is required for further assessment	A detailed roof plan has been prepared and is provided at **Attachment A**.
DPE 12b	• Demonstrate a compliant building form (height and setbacks) on the built form diagrams showing the proposed building and the previously approved building (Section 1 of the Summary of Response).	Refer to the Supplementary Design Report at **Attachment B**. Pursuant to the Department's correspondence issued on 1 April 2019, the compliant envelope has been built to the northern and western boundaries and would present a blank, inactive façade.
DPE 12c	• Demonstrate setback between proposed podium level and tower level setbacks and adjoining property boundary to the south	The building separations have been added to the drawings as illustrated at **Attachment B.** The Drawings are to scale so any measurement can be taken from the plans.
DPE 13a	**Other remaining outstanding items** • Submission of an ACHAR	An Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared by Artefact and is provided at **Attachment H**. The ACHAR confirms that: • No previously unrecorded Aboriginal sites were identified within the study area; and • All sections of the study area are highly disturbed and have low archaeological potential therefore no direct impact from the project on Aboriginal cultural heritage have been identified.
City of Sydney Council		
COS 1a	The City has reviewed the RTS and maintains it objection as most of the issues raised in the letter dated 15 November 2018 remain unaddressed	Noted.
CoS 2a	**SEPP 1 Objection – height and floor space ratio** The Council remains of the opinion that the SEPP 1 Objection is not well founded and should be rejected.	Noted, however, for the reasons outlined in the SEPP 1 Objection we disagree and believe that the Objection is well-founded, and environmental impacts arising from the non-compliance are minimal and acceptable, particularly when compared to the impacts which would arise from the delivery of the approved residential building pursuant to the current SSD 7080 development consent.

Item Raised		Proponent's Response
CoS 3a	**Wind Impacts** • As per the previous submission, the Windtech Report notes that there are issues with the recently approved IGLU development (level 1 courtyard). Refer to page 20 of Appendix Y "The north side of the adjoining Level 1 courtyard located on 60-78 Regent Street is exposed to wind conditions which exceed the comfort criteria dues to the west and south-west wind directions. The prevailing westerly winds are seen to funnel between the neighbouring developments to the west which are down washing into the courtyard area".	Windtech has reviewed the wind impact related comments and provided a response within **Attachment D**. Windtech's responses have been incorporated into this table for completeness. In addition to Windtech's technical response, we wish to reiterate that the Iglu facility will operate as an integrated campus with the approved Iglu facility to the north which includes a diverse range of indoor and outdoor communal open spaces. The integration of the two facilities will ensure students have access to a range of high quality indoor, rooftop and outdoor communal open space and can occupy these various spaces depending on the prevailing weather conditions at the time. As such, the Level 1 courtyard is not the only space available, it forms part of a diverse and high-quality communal space network. It is not reasonable or possible to ensure that every communal open space is 'weather proofed' against all possible weather conditions.
		This item is in relation to the comfort exceedance at Point 13 of the Pedestrian Wind Environment Report (WC853-04F02(rev1)- WE Report). Due to this exceedance, appropriate in-principle treatment recommendations have been made to address this through the use of planting, as outlined in the report in the form of landscaping, and confirmed in the Letter for Pedestrian Wind Environment Mitigation (Doc. Ref.:WC853-05F01(rev0)- WE Letter). In relation to this, the Landscape Statement and Landscape Plans prepared by 360 at **Attachment F** confirms the new plating within the Level 1 communal open space will be in accordance with Windtech's recommendations.
CoS 3b	• As the prevailing conditions are similar, if not exactly the same, for the proposed adjoining courtyard on the subject site, it is unacceptable for the Department to support a development which results in similarly poor amenity for users of this courtyard.	This item is in relation to the conditions at Points 11, 12 and 13 of the Pedestrian Wind Environment Report (WC853-04F02(rev1)- WE Report). Wind tunnel testing has demonstrated that Points 11 and 12, located on the southern side of the Level 1 courtyard pass both the target comfort (short duration stationary activities) and safety criteria, and therefore no mitigation measure are necessary to meet this criteria. It has therefore been demonstrated through quantitative wind tunnel testing that the winds affecting Point 13 does not result in similarly poor amenity for users of the southern side courtyard.
CoS 3c	• It is recommended that alternatives are considered which mitigate the wind impacts, and that re-testing via wind tunnel is undertaken using the "sitting" 4m/s comfort criteria.	Regarding wind criteria, Windtech generally assigns a standing criterion to communal terraces in most cases for the following reasons: • In the event of a strong wind event, occupants are unlikely to use that space for long durations (BBQ's, events, etc.) • The most common use of the space would be for short duration stationary activities and thoroughfare, which is unlike a fine dining establishment or outdoor theatre, where outdoor seating for a long duration is necessary for the intended use (generally sitting criteria applied). • "Sitting" is generally used to describe areas where long duration stay is expected (generally more than 1 hour), based on published data, and not necessarily whether or not a seat has been provided. • "Standing" is generally used to describe areas where short duration stay is expected (generally less than 1 hour), based on published data. The City of Sydney criteria has been based on the same published data. No further wind tunnel testing is required to reanalyse the conditions of points that have already been tested for another criterion. Note that using a stricter criterion is likely to lead to additional treatment measures being recommended to meet the more stringent requirements. Please refer to point 1 and point 2 within the DPE 5b response above.

Item Raised		Proponent's Response
CoS 3d	• It is unclear whether "stagnates" means that the comfort criteria is achieved. Again, further testing is required to demonstrate adequate comfort conditions for users of the outdoor courtyard. For the avoidance of doubt, wind tunnel testing using the "sitting" 4m/s comfort criteria should be undertaken.	This item is in relation to the conditions between Points 11 and 12 of the Pedestrian Wind Environment Report (WC853-04F02(rev1)- WE Report). These two critical locations have been tested to quantify the effect of the down washed winds from the tower above, and to assess whether or not this would cause an adverse wind effect. The area between these two points, based on Windtech's extensive experience in this field, has been assessed to be a "stagnation region", which refers to an area where there is little to zero wind velocity (by definition), and therefore is expected to achieve suitable wind conditions. This is due to the design of the building form and how it interacts with the prevailing winds. Please refer to point 1 and point 2 within the DPE 5b response above.
CoS 3d	• The wind report recommends "densely foliating evergreen trees capable of growing up to 2-4m in height with interlocking canopies along the centre line of the level 1 courtyard". • The landscape plans and architect plan layouts for Level 1 do not match Windtech's recommendation.	Refer to the Landscape Cover Letter and Amended Landscape Plans at **Attachment F**. There has been a change of tree species within the Level 1 courtyard. The courtyard landscape plan now includes *Cupaniopsis anacrdioides* (Tuckeroo) to provide a dense evergreen, interlocking canopy to mitigate against wind in accordance with Windtech's recommendations. It should also be noted the Level 1 podium landscape design also incorporates a planter along the North Western Face of the courtyard of *Bambusa Textillis Gracillis* which grows to 6m in height which will provide supplementary wind mitigation to the satisfaction of Windtech's recommendations.
CoS 3e	• As previously advised, the amelioration treatments should be tested via wind model testing to confirm their efficacy. The Department should not support the development unless it can be satisfied that the amelioration treatments achieve the stated effect.	The in-principle treatments outlined in the Pedestrian Wind Environment Report (WC853-04F02(rev1)- WE Report) have been recommended based on the testing results, and past experience in mitigating similar wind conditions. It is expected that with the implementation of the treatments recommended in the report, the wind conditions within and around the development are expected to be suitable for their intended uses. Further treatment optimisation can be performed at a more detailed design stage. Please refer to point 1 and point 2 within the DPE 5b response above.
CoS 3f	• In the absence of applicable wind controls for the RWA, and in light of existing unacceptable wind impacts in the local context directly caused by the absence of appropriate RWA controls for wind impacts, it is appropriate for the DCP controls to guide the assessment of the SSD.	The criteria used for the study have been outlined in the Pedestrian Wind Environment Report (WC853-04F02(rev1)- WE Report). The published environmental criteria and research that these controls have been based on are outlined in Appendix A of the report. Please refer to point 1 and point 2 within the DPE 5b response above.
CoS 4a	**Overshadowing** • The revised information confirms that residential properties within the conservation area to the south east of the site are impacted by the proposal (properties facing Cope Street and Renwick Street). • The analysis remains insufficient as the impacts to residential properties within the conservation area to the south east is neither quantified nor justified having regard to the DCP controls. The Department should not support the development unless it can be satisfied that the impacts fall within the threshold of the controls.	Bates Smart have updated the shadow diagrams to include hourly intervals as illustrated at **Attachment B.** As demonstrated on the shadow diagrams, the shadow cast by the proposed development is generally consistent with the shadow cast by a compliant envelope and in some cases presents a reduced shadow. As the proposal incorporates BCA compliant floor to floor heights to a maximum extent of 18 storeys for a student accommodation use, it can achieve a lower 18 storey building height than an equivalent 18 storey residential apartment or commercial building whilst still achieving Apartment Design Guide-compliant floor to ceiling heights (notwithstanding that the Apartment Design Guide does not apply to student accommodation). The proposed development does not contribute any significant overshadowing to public places or public open space when compared to a compliant building envelope. As maintained throughout the assessment, the proposal presents a net reduction in overshadowing when compared to the residential development approved under SSD 7080. As such, the Department and the (then) Planning Assessment Commission (PAC) as the consent authority have accepted and approved a development that creates a greater shadow impact than the proposed development.

Item Raised		Proponent's Response
		In light of the above, and considering the site's highly urbanised context, the proposal is considered appropriate from an overshadowing perspective.
CoS 5a	**Non-Compliant Street Setbacks** • Wind impacts at the south east corner have not been satisfactorily resolved. The Redfern Waterloo Urban Design Principles (UDP) recommends a setback of 4m to Marian Street above podium height. The application proposes 1.3m. • Until the revised awning treatment is tested to confirm acceptable comfort levels, this remains a determinative issue, as any changes to the setbacks result in extensive changes to the built form.	The in-principle treatment strategies outlined in the Pedestrian Wind Environment Report (WC853-04F02(rev1)- WE Report) (continuous full-width awning) for the adverse wind impacts at the south-east corner are expected to mitigate the wind effects in this area. For absolute clarity, Windtech have been operating for just under 30 years providing advanced wind engineering services, primarily in the study of wind effects on large structures, façade cladding as well as environmental wind effects. Since its establishment, Windtech has provided wind engineering and related high technology services for over 2,500 major building projects including Iglu Redfern 1, and the Urba and Diecota buildings within the street block. Windtech's extensive experience in this field enables the development of reliable wind mitigation strategies based on the original wind tunnel testing. In this regard, the requirement to undertake very timely and costly additional wind tunnel testing is considered onerous and unnecessary at this stage of the assessment process. Please refer to point 1 and point 2 within the DPE 5b response above
CoS 6a	**Visual Privacy** • Consideration of the Redfern Waterloo Urban Design Principles does apply to this site. This 'calls in' the Residential Flat Design Code (which has been superseded by the Apartment Design Code) - refer to page 29, part 3.2.4 Building Separation. The UDP clearly requires a 18m separation for buildings in excess of 8 storeys.	Despite the RFDC separation controls being referenced within the Draft Redfern Waterloo Urban Design Principles, it does not change the fact that under SEPP 65 the (now) Apartment Design Guide does not apply to student accommodation developments. The proposed development has been carefully designed to minimise visual privacy impacts on surrounding residents as assessed within **Section 6.3.3** of the EIS. Further to this, the proposal remains materially consistent with the approved building envelope under SSD 7080 which comprised a more sensitive residential use.
CoS 6b	• Any approval which reduces the setback prejudices future residential development of 90 Regent Street and results in sub-standard amenity for both sites. A greater setback is required to achieve good amenity for both sites.	
CoS 7a	**Land Contamination** • The DESI and RAP should be peer reviewed by a NSW EPA Accredited Site Auditor and include a section B Site Audit Statement or a letter of Interim advice from the Site Auditor certifying that the RAP is practical and the site will be suitable after remediation for the proposed use. The Department should satisfy itself that the provisions of SEPP 55 are met.	Refer to the site investigation letter prepared by EI Australia at **Attachment K.**
CoS 8a	**Level 1 common open space** • The common open space will be overshadowed on June 21 and the design does not achieve 2 hours access to sunlight. • The applicant's argument that the common open space achieves good soil access and views in summer solstice is erroneous. The extent of overshadowing in winter makes the space uncomfortable and unlikely to be used by the residents.	Bates Smart have assessed and quantified the amount of solar access provided to the Level 1 communal open space as presented at **Attachment B.** Refer to the response to DPE 6d above.
CoS 8b	• It is further noted that the layout of trees on the landscape plans do not match Windtech's recommendation.	Refer to the Landscape Cover Letter and Amended Landscape Plans at **Attachment F**. There has been a change of tree species within the Level 1 courtyard. The courtyard landscape plan now includes *Cupaniopsis anacrdioides* (Tuckeroo) to provide a dense evergreen, interlocking canopy to mitigate against wind. It should also be noted the Level 1 podium landscape design also incorporates a planter along the

Item Raised		Proponent's Response
		North Western Face of the courtyard of *Bambusa Textillis Gracillis* which grows to 6m in height which will provide supplementary wind mitigation to the satisfaction of Windtech's recommendations.
CoS 9a	**Level 17 rooftop terrace** • This is a new development and there should be no reason why structural loads are not designed to achieve minimum soil depth for trees on slab.	Refer to the Landscape Cover Letter and Amended Landscape Plans at **Attachment F.** An additional section has been prepared to illustrate the fold in the Level 1 courtyard slab to support growing media for the proposed *Chamerops humillis*.
CoS 9b	• It is also noted that the landscape section and annotations show a planter depth of 850mm, not 900mm.	Refer to the Landscape Cover Letter and Amended Landscape Plans at **Attachment F.** All podium gardens have been increased to achieve a minimum planter depth of 900mm with localised mounding around trees up to 1200mm in depth.
CoS 9c	• No additional plans or details have been submitted for the arbour and roof top design. As this is a detailed (and final) development application, these matters should be properly address prior to determination of the application.	A detailed roof plan has been prepared and is provided at **Attachment A**.
CoS 9d	• Ulmus parvifolia 'todd' are deciduous trees that shed leaves. The design is reliant on trees to reduce high wind impacts. During winter, as well as period in autumn and spring, the Level 1 common open space will be a windy and uncomfortable space. • It is also noted that the Chamerops humillis is a dwarf Mediterranean palm. • The palm planter detail within a deep fold in the structural slab is not included in the plans. Details have not been provided to demonstrate the planter feasibility	Refer to the Landscape Cover Letter and Amended Landscape Plans at **Attachment F**. There has been a change of tree species within the Level 1 courtyard. The courtyard landscape plan now includes *Cupaniopsis anacrdioides* (Tuckeroo) to provide a dense evergreen, interlocking canopy to mitigate against wind. It should also be noted the Level 1 podium landscape design also incorporates a planter along the North Western Face of the courtyard of *Bambusa Textillis Gracillis* which grows to 6m in height which will provide supplementary wind mitigation to the satisfaction of Windtech's recommendations.
CoS 9e	• The planter depths do not comply with the minimum soil depths in the Sydney Landscape Code. As noted earlier, this is a new building that should be designed to accommodate the structural loads required.	Refer to the Landscape Cover Letter and Amended Landscape Plans at **Attachment F**. An additional section has been prepared to illustrate the fold in the level 1 courtyard slab to support growing media for the proposed *Chamerops humillis*. All podium gardens have been increased to achieve a minimum planter depth of 900mm with localised mounding around trees up to 1200mm deep.
CoS 10a	**Quality of communal open space and wind issues** • The landscape plans and architect plan layouts for Level 1 do not match Windtech's recommendation.	Refer to the Landscape Cover Letter and Amended Landscape Plans at **Attachment F.** There has been a change of tree species within the Level 1 courtyard. The courtyard landscape plan now includes *Cupaniopsis anacrdioides* (Tuckeroo) to provide a dense evergreen, interlocking canopy to mitigate against wind. It should also be noted the Level 1 podium landscape design also incorporates a planter along the North Western Face of the courtyard of *Bambusa Textillis Gracillis* which grows to 6m in height which will provide supplementary wind mitigation to the satisfaction of Windtech's recommendations.
CoS 10b	**End of trip facilities** • The plans have been updated to incorporate end of trip facilities, however this is not clearly labelled on the plans to indicate which is for students and for the commercial/retail occupants.	The Architectural Drawings at **Attachment A** have been updated to include annotations which clearly identify the bike storage areas allocated to the student accommodation use.
CoS 11a	**Waste Storage and Laundry facilities** • The applicant's response does not satisfactorily address the Council concerns.	Noted. The Applicant maintains the justification provided within the previous RtS and notes that this has been previously accepted by the Department and the then PAC on a number of other student accommodation projects.

Item Raised		Proponent's Response
CoS 12a	**SEPP (Building Sustainability Index) 2004** • Appendix F has not been included in the documents on the Department's website.	BASIX certificate has been prepared and is currently being updated by IGS to reflect an amalgamated site. The amended BASIX Certificate will be provided following submission of this RtS Addendum.
CoS 13a	**Public Domain** • Should the Department be of the mind to support the application, the City's suite of public domain conditions addressing alignment levels, dilapidation reports of the public domain, stormwater, lighting, submission of public domain plans, provision of security, defects liability periods and the like, should be imposed.	Noted.
Government Architect NSW		
GA 1a	We have reviewed the RTS and are satisfied that the project has been subject to a design excellence process through which design modifications broadly respond to the items raised through the design review	Noted.
GA 2a	There were a number of other items that you raised during the last design review meeting, in particular with regard to the City of Sydney's submission, and we trust that these items have been addressed by the applicant also.	Noted.
GA 3a	One very minor item is the presence of stairs between the Bike Storage for 18 bicycles and the William Street exit. In design terms it would be preferable to consolidate student bicycle storage and end of trip facilities so that access to the street is direct and doesn't require level entry changes.	The bike storage arrangement at the ground level has been modified as illustrated on the Architectural Drawings at **Attachment A** and discussed further at **Section 1.1** of the Cover Letter. The bike storage areas have not been consolidated as they are allocated to different uses. Two ground floor bike storage areas containing a combined total of 41 bike parking spaces have been dedicated to the student accommodation use and one storage area to the retail/commercial tenants containing 14 bike parking spaces. All ground floor bike storage areas can be accessed via the Marian Lane entrance, however the in response to the GANSW's recommendation, the retail/commercial bike storage area has direct access to William Lane.
Roads and Maritime Services		
RMS 1a	Reference is made to the Department's correspondence dated 24 January 2019, regarding the abovementioned RTS which was referred to Roads and Maritime Services (Roads and Maritime) for comment. Roads and Maritime has reviewed the submitted information and has no further comment.	Noted.
Sydney Metro		
SM 1a	Prior to the commencement of works, the Applicant shall provide to Sydney Metro for approval, details of proposed boreholes in compliance with the Sydney Metro Underground Corridor Protection Guidelines	Noted.
SM 2a	Prior to the issuing of a Construction Certificate, the Applicant shall prepare and provide to Sydney Metro for approval, details on the design and construction of the foundation system. This should include all relevant levels and cross sectional drawings showing the proposed footing excavation and structural design of sub ground support	Noted.

Item Raised		Proponent's Response
	for the proposed foundations in compliance with the Sydney Metro Underground Corridor Protection Guidelines	
Transport for NSW		
TfNSW 1a	**Protection of CBD Rail Link (CBDRL) Corridor** It is noted that Attachment R has been prepared for the Sydney Metro City and Southwest Tunnel corridor and no reference has been made to the CBDRL corridor. Sydney Metro will provide a separate response for the Sydney Metro City and Southwest Tunnel corridor It is requested that the applicant be conditioned to provide the information required to make an appropriate assessment whether the building foundations will have any impact on the future CBDRL rail corridor infrastructure and undertake a rail noise & vibration assessment for the CBDRL rail corridor.	Noted.
TfNSW 2a	**Construction Pedestrian and Traffic Management** It is requested that the applicant be conditioned to update the Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with the Sydney Coordination Office within TfNSW and Roads and Maritime Services. A copy of the final plan shall be submitted to the Coordinator General, Transport Coordination within TfNSW for endorsement, prior to the commencement of any work on site.	Noted.
TfNSW 3a	**Freight and Service Management** It is requested that the applicant be conditioned to prepare a Loading and Servicing Management Plan in consultation with the Sydney Coordination Office within TfNSW and submit the final Plan for the endorsement of the Coordinator General, Transport Coordination prior to the issue of the occupation certificate.	Noted.
Urban Growth NSW		
UG 1a	**Redfern Waterloo Authority Affordable Housing Contributions Plan** The application response to submissions, revises the gross floor area to 7,188m^2. The applicant has confirmed the area of existing floorspace on the development site is 970m^2. The additional floorspace is therefore 6,218m^2 (7,188 – 970m^2). The affordable housing contribution is $540,220. Before payment the contributions will need to be indexed annually by Building Price Index – Sydney, in accordance with the affordable housing contributions plan.	The proposal now contains 7,374m^2 of GFA as such, the affordable housing contribution will need to be amended accordingly.
UG 2a	**Redfern Waterloo Authority Contributions Plan**	Noted.

Item Raised		Proponent's Response
	The contribution under this plan is calculated as a rate of 2% of the proposed cost of carrying out the development including GST. The application response to submissions, revises the proposed cost of development to $39,930,000 (including GST). The contribution is $798,600. Before payment, the contributions will need to be indexed quarterly by the CPI, in accordance with the contributions plan.	